

REMARKS/ARGUMENTS

The Examiner's rejection is traversed for the following reasons:

- (a) The cited art does NOT teach or suggest a security rule defined based on a security policy for exchanging SOAP messages between client and server programs

It is noted that Provisional application No. 60/324,191 states that a web service infrastructure is able to check authentication, authorization, and billing information and determine if a method call should be allowed to proceed to the service. However, it is respectfully submitted that checking authentication, authorization, or billing information does NOT teach or suggest a security rule defined for a SOAP messages based on a security policy.

- (b) The provisional application No. 60/324,191 does NOT teach or suggest a security rule including a mapping between one or more security-keys that are respectively used by a client and a server program

Contrary to the Examiner's assertions, it is respectfully submitted that inserting parameters for method calls does NOT teach or suggest mapping security keys.

- (c) The Examiner's rejection of claim 16 is improper because the Examiner's rejection is NOT based on prior art

It is respectfully submitted that the Examiner's rejection of claim 16 is improper because it is based on U.S. Publication Number 2003/0061401 A1 (*Atwal et al.*) and U.S. Publication Number 2003/0074579 A1 (*Della-Libera et al.*) which respectively have the filing dates of September 23, 2003 and February 6, 2002 (both after the filing date of the above-identified application). Accordingly, it is respectfully submitted that the Examiner should withdraw the rejection of the claims.

It is noted that *Atwal et al.* and *Della-Libera et al.* have a corresponding provisional applications. However, it should also be noted that the 35 U.S.C. 102(e) date of a reference that did not result from, nor claimed the benefit of, an international application is its earliest effective U.S. filing date, taking into consideration any proper benefit claims to prior U.S. applications under 35 U.S.C. 119(e) or 120 if the prior

STELP002

15 of 17

application(s) properly supports the subject matter used to make the rejection in compliance with 35 U.S.C. 112, first paragraph as outlined in MPEP §2136.02 (see, MPEP 706.02(f)(1), Examination Guidelines for applying references under 35 U.S.C. 102(e)). In this case, the Examiner has NOT properly supported the rejection based on the provisional applications. In fact, the Examiner's rejection does NOT even make a reference to the provisional applications or even make a general allegation that the provisional applications properly support the Examiner's rejection. Accordingly, it is respectfully submitted that the Examiner's rejection is clearly improper and should be withdrawn.

(d) Della-Libera et al. does NOT teach or suggest the features recited in claim 16

In the Final Office Action, the Examiner has generally alleged that paragraphs 51-55 and paragraphs 58 and 59 of *Della-Libera et al.* teach all of the claimed features of claim 16. Contrary to the Examiner's assertion, it is respectfully submitted that these paragraphs do NOT teach or suggest the features of claim 16.

(e) The Examiner has failed to establish prima facie case of obviousness

Initially, it is respectfully submitted that a general goal of desire for security does NOT provide a specific motivation for combining the web services infrastructure of *Atwal et al.* with the teaching of *Della-Libera et al.* Indeed, the mere fact that, for example, efficiency is generally desirable does NOT in itself provide the motivation for combining two subsystems that when combined may prove to be more efficient.

Furthermore, the mere allegation that the combination of *Atwal et al.* and *Della-Libera et al.* provide security does NOT provide a motivation or suggestion for combining them in the first place. The mere fact that the references can be combined does NOT render the claimed invention obvious (MPEP, 2143.01, III). It is also insufficient to merely assert that the claimed invention is within the capabilities of one of ordinary skill in the art (MPEP, 2143.01, IV).

CONCLUSION

Based on the foregoing, it is submitted that all pending claims are patentably distinct over the cited art of record. Additional limitations recited in the independent claims or the dependent claims are not further discussed because the limitations discussed above are sufficient to distinguish the claimed invention from the cited art. Accordingly, Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 500388 (Order No. STELP002). Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,
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STELP002

17 of 17

PAGE 19/19 * RCVD AT 12/16/2005 5:23:06 PM [Eastern Standard Time] * SVR:USPTO-EFXRF-6/29 * DNIS:2738300 * CSID:16509618301 * DURATION (mm:ss):07:44